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16 Attorneys for Plaintiff,

17 OUIBY INC., d/b/a KICKFURTHER

18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

20 OUIBY INC., d/b/a KICKFURTHER,

21 Plaintiff,

22 v.

23 IDIL DOGUOGLU-POSEY, CARL POSEY
24 PHOTOGRAPHY, INC., CARL POSEY,

25 Defendants.

Case No. 3:17-CV-03847-EMC

**STIPULATION TO EXTEND THE DATE
OF CASE MANAGEMENT CONFERENCE
HEARING AND [PROPOSED] ORDER**

Trial Date: None Set

26 In accordance with Local Rule 6-1(b), 6-2 and 7-12, plaintiff OUIBY INC., d/b/a
27 KICKFURTHER (“Kickfurther”) and defendants IDIL DOGUOGLU-POSEY, CARL POSEY
28 PHOTOGRAPHY, INC., CARL POSEY (“Defendants,” unless stated otherwise) (collectively, the
“Parties”), hereby stipulate (subject to the approval of the Court) to extend the date with respect to the
upcoming Case Management Conference set for May 17, 2018, and all other dates currently on the
Court’s docket, so that the Parties can complete the settlement process, including the execution of all
relevant settlement documents.

1 The Parties state and stipulate as follows:

2 1. WHEREAS, on January 22, 2018, the Parties participated in a Settlement Conference

3 before the Honorable Magistrate Judge Robert M. Illman;

4 2. WHEREAS, Kickfurther and Idil Doguoglu-Posey settled the case as to themselves;

5 3. WHEREAS, Kickfurther agreed to dismiss Carl Posey, individually;

6 4. WHEREAS, Kickfurther had filed a Motion to Enforce Settlement that was set to be heard

7 on May 17, 2018, which Kickfurther has now withdrawn without prejudice pursuant to the

8 Notice of Withdrawal of Motion to Enforce without Prejudice filed on May 4, 2018;

9 5. WHEREAS, there is currently a Case Management Conference set for May 17, 2018;

10 6. WHEREAS, the Parties believe that, in the interest of saving judicial resources, the date of

11 the Case Management Conference should be continued thirty (30) days from May 17,

12 2018, to give the Parties time to complete the settlement process;

13 7. WHEREAS, continuing the hearing date on the Case Management Conference to June 18,

14 2018 will save judicial resources and, and may obviate the need for the Case Management

15 Conference;

16 8. WHEREAS, the Parties believed that good cause exists to grant the instant stipulated

17 request; and

18 9. WHEREAS, this continuance of Case Management Conference is sought in good faith

19 and not for any improper purpose. Pursuant to Local Rules 6-1(b), 6-2 and 7-12, the

20 Parties stipulate to continue the upcoming Case Management Conference currently set for

21 May 17, 2018 to June 18, 2018, so that the Parties can have sufficient time to complete the

22 settlement process.

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1 Dated: May 8, 2018

2 By: _____
3 Idil Doguoglu-Posey

4 Dated: May 8, 2018

5 By: _____
6 Carl Posey

8 DATED: May 8, 2018

LEWIS BRISBOIS BISGAARD & SMITH LLP

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10 By: _____ /s/ René I. Gamboa
11 René I. Gamboa
12 Attorneys for Plaintiff,
13 OUIBY INC., d/b/a KICKFURTHER

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1 Dated: May 8, 2018

2 By: /s/ Idil Doguoglu Posey
3 Idil Doguoglu-Posey

4 Dated: May 8, 2018

5 By:
6 /s/ Carl Posey
7 Carl Posey

8 DATED: May 8, 2018

LEWIS BRISBOIS BISGAARD & SMITH LLP

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10
11 By: _____
12 René I. Gamboa
13 Attorneys for Plaintiff,
14 OUIBY INC., d/b/a KICKFURTHER

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[~~PROPOSED~~] ORDER

After consideration of the Parties stipulation set forth above:

IT IS HEREBY ORDERED THAT the Case Management Conference, which is currently set for May 17, 2018, shall be continued to ~~June 18, 2018.~~ June 28, 2018 at 10:30 a.m. Joint

IT IS SO ORDERED.

CMC statement shall be filed by
June 21, 2018.

DATED: May 11 2018

The Honorable Edward M. Chen
UNITED STATES DISTRICT COURT
JUDGE

